

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**MORGAN KUKOVEC**, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

**THE ESTÉE LAUDER COMPANIES INC.,**

Defendant.

Case No. 1:22-cv-01988

Hon. Manish S. Shah

Magistrate Judge Young B. Kim

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**JOINT MOTION TO ADJOURN THE PARTIES’  
JOINT STATUS REPORT DEADLINE**

Plaintiff Morgan Kukovec (“Plaintiff”) and Defendant The Estée Lauder Companies, Inc. (“Estée Lauder,” and with Plaintiff, the “Parties”) jointly submit this Motion to Adjourn the Parties’ Joint Status Report Deadline, currently set for June 1, 2022, until a date that follows the Court’s ruling on Estée Lauder’s pending Motion to Dismiss. In support of their Motion, the Parties state as follows:

1. On May 12, 2022, the Court issued an Order setting the Parties’ deadline to submit an initial Joint Status Report to June 1, 2022. (Dkt. 29).
2. On May 27, 2022, Estée Lauder filed its Motion to Dismiss Plaintiff’s Complaint and accompanying Memorandum of Law in Support. (Dkts. 30, 31). That same day, the Parties jointly submitted a proposed briefing schedule on the Motion to Dismiss to the Court. *See* May 27, 2022 email, attached hereto as Exhibit A.
3. In light of Estée Lauder’s pending Motion to Dismiss, the Parties respectfully request that the Court issue an Order adjourning the Parties’ Joint Status Report deadline until a date that follows the Court’s ruling on Estée Lauder’s pending Motion to Dismiss.

4. The Parties file this Motion in good faith and not for the purpose of improper delay.

WHEREFORE, the Parties respectfully request that this Court issue an Order adjourning the Parties' Joint Status Report deadline for the time being and until after the Court has ruled on Estée Lauder's pending Motion to Dismiss. In the alternative, the Parties request an additional week from the Court's ruling on this joint motion to submit a Joint Status Report to allow them sufficient time to meet and confer as to same.

Dated: June 1, 2022

Respectfully submitted,

/s/ Elizabeth C. Chavez (with authorization)

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Christopher A. Mair, an attorney, hereby certify that on June 1, 2022, I caused the foregoing **JOINT MOTION TO ADJOURN THE PARTIES' JOINT STATUS REPORT DEADLINE** to be electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all registered parties.

*Christopher A. Mair*

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Christopher A. Mair